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April 6, 1993

Donna R. Searcy, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

COMMENTS RE NPRM #92-235 / SPECTRUM REFARMING

Dear Ms. Searcy:

FCC MAIL ROOM

As a representative of a major public safety organization with a high reliance on radio telecommunications, I wish to state my extreme concern over the spectrum refarming proposal as it relates to public safety frequencies.

First, it is apparent that any significant reduction in deviation levels will have an immediate negative impact on system coverage and reliability.

Second, to achieve the reduced channel spacing goals contained in the docket, it is likely that existing public safety radio systems, including both portable and mobile equipment as well as fixed infrastructure, will need to be replaced. Changeout of an entire radio system would represent an enormous expense and a likely disruption of emergency services.

The replacement of our countywide MEDCOM radio system, as one example, would require at least two years for planning and procurement, an additional year for installation and optimization.